

JULY 9, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTRECEIVED
GffUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONJUL 2 2008 am
JUL 2 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTGREGORY CHAMPION(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 07C 7267(To be supplied by the Clerk of this Court)R. PallmeyerSalvador GodinezSupt. AndrewsDeputy Ms. ParksDeputy KingThomas Dart(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

4th

AMENDED COMPLAINTCOMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

A. Name: Gregory CHAMPION

B. List all aliases: _____

C. Prisoner identification number: 20060080031

D. Place of present confinement: Cook County Jail

E. Address: 2700 S. California
Formerly Division 2 Room 2 Ntier 12/04/07

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Andrews
Title: former Supt. DIVISION 2
Place of Employment: Cook County Jail

B. Defendant: Ms. Parks
Title: Sheriff Deputy DIVISION 2
Place of Employment: Cook County Jail

C. Defendant: MR. KING
Title: Sheriff Deputy DIVISION 2
Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. Salvador Godinez

EXE, Director

Cook County Jail

E. Thomas Dart

Sheriff

Cook County

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

- ① On 12/04/07, Plaintiff Champion was housed in minimum division 2, medical tier N house. ② on 10/15/07 gang leader Anthony Cargs threatened to kick Champion's A--. Champion immediately tendered letter to then supt. Andrews detailing threat and growing gang presence in N house. Andrews had his officers speak with Cargs, told him to leave me alone and do not talk to me. Shortly thereafter gang leader Floyd King was moved into N house. ③ Plaintiff tendered another letter to Andrews informing him of King's presence and status of major gang leader, maximum security lifelong habitual criminal. ④ On 02/04/07, King walked over and suckerpunched Champion in face, breaking his glasses, almost putting out his left eye. Cermak hospital already had Champion on 80 mgs of Propranolol blood pressure medicine and 1000 mgs naproxen per day for pain. ⑤ This punch severely aggravated preexisting medical situation.
- ⑥ Detainee King was moved up stairs, discipline report was filed.
- ⑦ at hearing, he was not punished and I was not allowed to press charges, aggravated assault & battery. ⑧ I ran to deputies Ms. Parks and deputy King, who laughed at me and ridiculed me and told me to

shut up.

- ⑨ All of the defendants, acted under color of law, violated the Constitution and 42 U.S.C. 1983. They are sued in their official and individual capacities.
- ⑩ Hodiney and Dent, are liable for failure to train and supervise, 42 U.S.C 1983. Also equal protection of the laws, they should have known I was not allowed to press charges. Their supervisory roles clearly define maximum security detainees not mix with minimum detainees, violating my liberty clause, and other 14th amendment particulars.
- ⑪ Andrews was informed of threats of violence to plaintiff, still allowed King to move from Dorm 3 AA house to Dorm 77 house. He was tendered letter telling of gang leaders presence. He is liable for failure to protect, violating the U.S. Constitution and 42 U.S.C. 1983, and failure to supervise and train his members.
- ⑫ Deputies Ms. Parks and King are liable for failure to protect, violating 42 U.S.C. 1983
- ⑬ State cases of failure to protect and Negligence are also applied to all defendants, ⁵ who with deliberate indifference, and Willful and Wanton Maliciousness disregarded minimum status of Plaintiff and subjected him to maximum detainees King and cargo.

I, Gregory Champion, individually incorporate all of the heretofore stated facts as though fully set forth herein.

Count 1: Sept. Andrews is liable for failure to protect, violating the U.S. Constitution and 42 U.S.C. 1983, with deliberate indifference and willful & wanton Maliciousness.

Count 2: Sept Andrews is liable for failure to supervise and train violating U.S. Constitution and 42 U.S.C 1983, with deliberate indifference and Willful & Wanton ~~is~~ Maliciousness.

Count 3: Godfrey is liable for failure to train violating the U.S. Constitution and 42 U.S.C 1983, with deliberate indifference and willful & wanton maliciousness.

Count 4: Godfrey & Dart are liable for the violation of the 14th amendment equal protection of the laws by denying me the right to press charges aggravated assault & Battery, with deliberate indifference and willful and Wanton malice, ^{U.S. Constitution} 42 U.S.C. 1983

Count 5: Dart is liable for failure to train and supervise his members as he is Sheriff of Cook County & responsible for the implementation of training procedures to his members, violating the Constitution and 42 U.S.C. 1983, with deliberate indifference and Willful & wanton maliciousness.

Count 6: Separates Ms. Parks & King are liable for failure to protect violating U.S. Constitution and 42 U.S.C. 1983, with deliberate indifference and Willful & wanton maliciousness.

Count 7: State charges of failure to protect & negligence are attached to all of the above named defendants, violating the Illinois Constitution, with indifference and Maliciousness.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want the jury to find defendants liable on all counts
awarding me 11 million 11,000,000. dollars.
I also seek punitive damages. M RSA, left untreated, can cause death 11
oo

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 24 day of June, 2008

Gregory L. Champion
(Signature of plaintiff or plaintiffs)

Greg L. Champion
(Print name)

20060080031
(I.D. Number)

1419 Woodhollow Ln.
Flossmoor IL 60422
(Address)